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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ELIZABETH R. ILAGAN,

Plaintiff,

v.

ROBERT McDONALD, Secretary of Veteran's
Affairs, and
DR. BRYAN WERNER, an individual,

Defendant.

2:16-cv-1209-APG-VCF

STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO FILE
STIPULATION OF DISMISSAL
(first request)

It is hereby stipulated and agreed by and between the parties to this action, through their respective counsel, as follows:

1. The parties participated in an Early Neutral Evaluation (ENE) on November 1, 2016, at which time a negotiated settlement was reached as to all claims. See Minutes of Proceedings (#20).
2. With one exception, all required elements of the negotiated settlement have been concluded. The parties are awaiting completion of certain revisions to plaintiff's official personnel file. That element of the negotiated settlement has been slightly delayed because of a delay in obtaining access to the personnel file from archives.

1 3. The December 13 deadline for filing the Stipulation for Dismissal has passed; however, the
2 parties anticipate the completion of the one remaining element of the negotiated settlement by January
3 27, 2017 – after which time the Stipulation for Dismissal will promptly be filed.

4 4. Based on the foregoing, the parties stipulate to an extension of the deadline to January 27,
5 2017, to file the Stipulation for Dismissal in this settled case and request approval of the extension.

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8 CARL A. LINDSTROM, JR., ESQ.
Counsel for Plaintiff

/s/ Greg Addington
GREG ADDINGTON
Assistant United States Attorney

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10 IT IS SO ORDERED

11 Date: December 19, , 2016

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13 UNITED STATES MAGISTRATE JUDGE
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